

**STEVE SCOW (NSBN 9906)**  
KING SCOW KOCH DURHAM LLC  
11500 S. Eastern Ave., Suite 210  
Henderson, NV 89052  
Telephone: (702) 833-1100  
Facsimile: (702) 833-1107  
Email: [sscow@kskdlaw.com](mailto:sscow@kskdlaw.com)  
*Attorney for Plaintiff*

**JAN K. TOMASIK (NSBN 15104)**  
**DANIEL A. MANN (NSBN 15594)**  
COZEN O'CONNOR  
1180 North Town Center Drive, Suite 260  
Las Vegas, NV 89144  
Telephone: (702) 470-2330  
Facsimile: (702) 470-2370  
Emails: [JTomasik@cozen.com](mailto:JTomasik@cozen.com);  
[Danielmann@cozen.com](mailto:Danielmann@cozen.com)  
*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LE MAITRE USA, LLC, a Nevada Corporation,  
Plaintiff,  
v.  
HUMBER-THAMES MARKETING LTD., dba  
MINERVA, a foreign corporation;  
Defendant

Case No.: 2:25-cv-00692

**JOINT STATUS REPORT AND  
STIPULATION AND [PROPOSED] ORDER  
TO STAY DISCOVERY PENDING  
RESOLUTION OF MOTION TO DISMISS**

Plaintiff **Le Maitre USA, LLC** and Defendant **Humber-Thames Marketing Ltd. dba Minerva**, by and through their respective counsel of record, hereby submit this Joint Status Report and request that the Court enter an Order staying all discovery in this matter until resolution of Defendant's pending **Motion to Dismiss** (ECF No. 3), pursuant to *Fed. R. Civ. P. 26(c)*.

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## I. STATUS OF THE CASE

This action is currently pending before the Court. On April 18, 2025, Defendant filed a Motion to Dismiss which is fully briefed and remains pending before the Court. No discovery has commenced, and no discovery schedule has been entered.

## II. STIPULATION TO STAY DISCOVERY

The parties stipulate and agree that good cause exists to stay discovery pending resolution of the Motion to Dismiss. Accordingly, the parties jointly request that the Court enter an Order staying discovery in this matter until such time as the Court has ruled on the pending Motion to Dismiss. In the event the Motion to Dismiss is denied in whole or in part, the parties will meet and confer and file a proposed Discovery Plan and Scheduling Order within 14 days of the Court's ruling.

### III. CONCLUSION

Accordingly, the parties respectfully request that the Court enter an Order staying all discovery in this case pending the resolution of Defendant's Motion to Dismiss.

DATED: May 16, 2025

## KING SCOW KOCH DURHAM LLC

By: /s/ Steve Scow  
Steve Scow (SBN 9906)  
11500 S. Eastern Ave., Suite 210  
Henderson, NV 89052  
*Attorneys for Plaintiff*

COZEN O'CONNOR

By: /s/ Daniel A. Mann  
Jan K. Tomasik (SBN 15104)  
Daniel A. Mann (SBN 15594)  
1180 North Town Center Drive, Suite 260  
Las Vegas, NV 89144  
*Attorneys for Defendant*

## ORDER

IT IS SO ORDERED. Discovery in this matter is hereby STAYED pending the Court's ruling on Defendant's Motion to Dismiss (ECF No. 3). The parties shall file a proposed Discovery Plan and Scheduling Order within 14 days of the Court's ruling on the Motion to Dismiss, if the case remains active.

Dated: 5-21-25

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**UNITED STATES MAGISTRATE JUDGE**

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1                   **CERTIFICATE OF SERVICE**

2                   I hereby certify that on May 16, 2025, I electronically filed the foregoing documents: **JOINT**  
3 **STATUS REPORT AND STIPULATION AND [PROPOSED] ORDER TO STAY**  
4 **DISCOVERY PENDING RESOLUTION OF MOTION TO DISMISS**, with the Clerk of the  
5 Court by using the CM/ECF system and that foregoing document is being served on all counsel of  
6 record via transmission of Notice of Electronic Filing generated by CM/ECF.

7                   */s/ Sherry Harper*  
8                   An Cozen O'Connor Employee

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